



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

April 29, 2014

CHAIRMAN RANAE LENTZ, TREASURER  
OHIO REPUBLICAN PARTY STATE CENTRAL  
& EXECUTIVE COMMITTEE  
211 S. FIFTH STREET  
COLUMBUS, OH 43215

**Response Due Date**  
**06/03/2014**

IDENTIFICATION NUMBER: C00162339

REFERENCE: MARCH MONTHLY REPORT (02/01/2014 - 02/28/2014)

Dear Treasurer:

This letter is prompted by the Commission's preliminary review of the report referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **Failure to adequately respond by the response date noted above could result in an audit or enforcement action.** Additional information is needed for the following 5 item(s):

1. The beginning cash balance of this report does not equal the ending balance of your February Monthly Report (1/1/14 - 1/31/14). Please correct this discrepancy and amend all subsequent report(s) that may be affected by the correction. (2 U.S.C. § 434)(b)(1))
2. The totals listed on Lines 7, 21(a)(i), 21(a)(ii), 21(c), 31, and 32, Column B of the Summary and Detailed Summary Pages appear to be incorrect. Column B figures for the Summary and Detailed Summary Pages should equal the sum of the Column B figures on your previous report and the Column A figures on this report. Please file an amendment to your report to correct the Column B discrepancies for this report and all subsequent report(s) which may be affected by this correction. Note that Column B should reflect only the Calendar Year-to-Date totals. (2 U.S.C. § 434(b))
3. Schedule D of your report discloses several credits for debts owed to "Oxford Communications." Please provide further clarification regarding these credits.
4. Schedule H4 of your report discloses \$10,200 in payments for "Fundraising Consultant - not candidate specific" to individuals. Please clarify whether these individuals are employees of your committee. If they are employees,

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please clarify whether this activity is for employees who spent 25% or less of their time during the month(s) referenced above on Federal Election Activity (FEA) or activities in connection with a Federal election. You are advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time in a given month on FEA or activities in connection with a Federal election must not be allocated between or among federal, non-federal and Levin accounts. Rather, only federal funds may be used.

Any reimbursement from your committee's non-federal or Levin account for salary and wage payments for employees who spent more than 25% of their compensated time in a given month on FEA is not permissible and must be returned. Please provide clarification regarding these payments.

**5.** Schedule H4 supporting Line 21(a) of your report discloses a payment(s) for "Am Ex - Insurance premium - not candidate specific," "Grand Island Insurance Premium - not candidate specific," and "Insurance Premium - not candidate specific." Please be advised that pursuant to 11 CFR §300.33(c)(2), salaries and wages for employees who spend more than 25% of their compensated time in a given month on Federal Election Activity (FEA) or activities in connection with a Federal election must not be allocated between or among federal and non-federal accounts. Rather, only federal funds may be used. Further, the Commission concluded in Advisory Opinion 2003-11 that amounts spent for employee-specific "fringe benefits," consisting of health insurance, disability insurance, life insurance, retirement benefits and payroll taxes, fall into the category of compensated time.

Please clarify whether this activity is for employees who spent 25% or less of their time during the month(s) referenced above on FEA or activities in connection with a Federal election. If this is not the case, any reimbursement from your committee's non-federal account for this payment is not permissible and must be returned. Although the Commission may take further legal action regarding any improper allocation activity, your prompt action will be taken into consideration.

- Your report discloses certain categories of financial activity that have been reflected on the wrong lines of the Detailed Summary Page. For your information and consideration when preparing future filings, contributions from other political committees and transfers from affiliated committees should be properly disclosed on separate Schedules A, supporting Lines 11(c) and 12, respectively, of the Detailed Summary Page.

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Please refer to the instructions for each line when determining the proper categorization(s) for your next filing. (2 U.S.C § 434(b) and FORM 3X Instructions)

**Please note, you will not receive an additional notice from the Commission on this matter.** Adequate responses must be received by the Commission on or before the due date noted above to be taken into consideration in determining whether audit action will be initiated. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action. **Requests for extensions of time in which to respond will not be considered.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1177.

Sincerely,

A handwritten signature in black ink, appearing to read 'Brian Jones', with a stylized flourish at the end.

Brian Jones  
Senior Campaign Finance Analyst  
Reports Analysis Division